

U.S. Fish and Wildlife Service Review
Second Draft Biological Assessment
for
Routine Training and Stryker Brigade Combat Team Transformation:
Schofield Barracks East Range
April 4, 2003

Biological Assessment - Schofield Barracks East Range (SBER)

General Comments

- As previously stated in other installation comment sections, it difficult to provide an assessment of impact associated with Legacy or SBCT training activities based upon the level of information provided in the draft BA. For Legacy training, there is no discussion of how frequently each action occurs or how many people are involved for each of these actions. This makes is difficult to compare Transformation and Legacy training. As such, is it reasonable to expect that, with specific, enforceable restrictions, that small populations/occurrences of T&E species could be avoided during rappelling and jungle survival activities? With foot patrols, are the numbers of personnel so limited that the risk of impact to listed plants and snails is very small? If the information is not available, the BA needs to state clearly that it is not, and the Service will analyze potential impacts to T&E species assuming the level of impact from training based on what can be discerned from the BA.
- The WFMP SOP for KLOA states that a fire of 310 acres burned from a hot brass/muzzle flash, presumably a blank. This raises a big concern for the Service, since blank ammunition is being treated as a low fire risk throughout the BA (see comments on the action area in the general comments section of the first email).
- Without a clear picture of where vehicles really will actually travel, along with where and what dismounted training is to occur and where ammunition is used, the Service cannot consider a "mid-credit" line in terms of management of populations of T&E species within the proposed action area.
- It is unclear what type of activities would occur in ER-13 and along the summit ridge trail which constitutes the action area's eastern boundary. There is a high density of T&E species in this area. Text on page 171 says that "the use of higher elevation areas in the eastern portion of East Range.....would continue to be limited..... in dense forest vegetation." While this implies that the area would not be used with great frequency, it still will be used to some extent. The nature of that extent is critical to our providing a thorough assessment of the potential effect that could result from the Army's actions.
- A clear connection needs to be made between the type of training proposed with transformation activities and the general descriptions of training types in Chapter 2.

EXHIBIT 85